

1 Richard A. Harpootlian, *pro hac vice*
2 *rah@harpootlianlaw.com*
3 Phillip Barber, *pro hac vice*
4 *pdb@harpootlianlaw.com*
5 RICHARD A. HARPOOTLIAN, PA
1410 Laurel Street
Columbia, South Carolina 29201
Telephone: (803) 252-4848
Facsimile: (803) 252-4810

6 Bryan M. Sullivan, State Bar Number 209743
7 *bsullivan@earlysullivan.com*
8 Zachary C. Hansen, State Bar Number 325128
9 *zhansen@earlysullivan.com*
EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP
6420 Wilshire Boulevard, 17th Floor
Los Angeles, California 90048
Telephone: (323) 301-4660
Facsimile: (323) 301-4676

11 Attorneys for PLAINTIFF
12 ROBERT HUNTER BIDEN

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 ROBERT HUNTER BIDEN, an
17 individual,

18 Plaintiff,

19 vs.

20 PATRICK M. BYRNE, an individual,

21 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S TRIAL EXHIBIT LIST**

Pretrial Conference: **July 21, 2025**
Time: **3:00 p.m.**

Jury Trial **July 29, 2025**
Time: **9:00 a.m.**

22 Judge: Hon. Stephen V. Wilson,
23 Ctrm. 10A

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1 Pursuant to Fed. R. Civ. P. 16 and Local Rule 16-2.3, Plaintiff Robert Hunter
2 Biden (“Plaintiff”) sets forth the following proposed exhibits for trial.¹ Plaintiff
3 expressly reserves the right to further amend the Trial Exhibit List to add documents
4 obtained as a result of any additional discovery and as may be necessary for
5 impeachment, rebuttal, or otherwise based upon the evidence adduced at trial.

6 **Case Title:** Robert Hunter Biden v. Patrick M. Byrne

7 **Case No:** 2:23-cv-09430-SVW-PD

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
10 1.	Capitol Times Magazine, Issue 1, published on June 27, 2023 (RHB00001-99)		
13 2.	Telegram post by Defendant Patrick Byrne on March 20, 2022, including associated comments (RHB00695)		
16 3.	Telegram post by Defendant Patrick Byrne on April 7, 2022, including associated comments (RHB00696)		
19 4.	Telegram post by Defendant Patrick Byrne on October 20, 2022 reposting post from Qtime Network, including associated comments (RHB00697)		

24 ¹ Plaintiff’s counsel attempted to meet and confer with Defendant’s counsel in an effort to submit a joint exhibit list, as required by the Local Rules, however Defendant’s counsel refused to engage in that process without first receiving a draft of Plaintiff’s proposed jury instructions and verdict form, which is irrelevant to the preparation of the exhibit list and are not due to be filed until two days before the Final Pretrial Conference. Having waited over a week for Defendant’s compliance, Plaintiff filed his own list to avoid further delay.

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
5.	Telegram post by Defendant Patrick Byrne on December 12, 2022, including associated comments (RHB00698)		
6.	X post by Defendant Patrick Byrne on January 5, 2023, including associated comments (RHB00718)		
7.	X post by Defendant Patrick Byrne on January 7, 2023, including associated comments (RHB00721)		
8.	X post by Defendant Patrick Byrne on February 10, 2023, including associated comments (RHB00699)		
9.	X post by Defendant Patrick Byrne on February 12 2023, including associated comments (RHB00700)		
10.	X post by Defendant Patrick Byrne on February 24, 2023, including associated comments (RHB00701)		
11.	X post by Defendant Patrick Byrne on March 17, 2023, including associated comments (RHB00100, RHB00702)		
12.	X post by Defendant Patrick Byrne on March 28, 2023 (RHB00110, 150)		
13.	X post by Defendant Patrick Byrne on April 17, 2023, including associated		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	comments (RHB00716)		
14.	X post by Defendant Patrick Byrne on May 10, 2023, including associated comments (RHB00720)		
15.	Screenshot of link to Defendant Patrick Byrne's May 10, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00186)		
16.	Screenshot of link to Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00187)		
17.	Transcript of Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00711-RHB00715)		
18.	Certified Transcript of Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i>		
19.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00101, 104)		
20.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00102-103, 112-117,		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
119)			
21.	Telegram post by Defendant Patrick Byrne on June 24, 2023, including associated comments (RHB00703)		
22.	X post by Defendant Patrick Byrne on June 25, 2023, including associated comments (RHB00719)		
23.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00151-152)		
24.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00153-155)		
25.	Telegram post by Defendant Patrick Byrne on June 28, 2023, including associated comments (RHB00157)		
26.	X post by Defendant Patrick Byrne on June 29, 2023, including associated comments (RHB00105-106)		
27.	Telegram posts by Defendant Patrick Byrne on July 4, 2023, including associated comments (RHB00156)		
28.	Telegram post by Defendant Patrick Byrne on July 5, 2023, including associated comments (RHB00158-161)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
29.	Telegram post by Defendant Patrick Byrne on July 6, 2023, including associated comments (RHB00162)		
30.	Telegram post by Defendant Patrick Byrne on July 21, 2023, including associated comments (RHB00163-164)		
31.	Screenshot of link to Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00185)		
32.	Transcript of Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00722-RHB00789)		
33.	Certified Transcript of Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i>		
34.	Telegram post by Defendant Patrick Byrne on July 22, 2023, including associated comments (RHB00167)		
35.	Telegram post by Defendant Patrick Byrne on July 28, 2023, including associated comments (RHB00168)		
36.	Screenshot of link to Defendant Patrick Byrne's September 8, 2023 interview on		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
3	<i>The Courtenay Turner Podcast</i> , Episode 4 305: <i>Behind the Testimony of America's</i> 5 <i>#1 Domestic Extremist w/ Patrick Byrne</i> 6 (RHB00184)		
7	37. Transcript of Defendant Patrick Byrne's 8 September 8, 2023 interview on <i>The</i> 9 <i>Courtenay Turner Podcast</i> , Episode 305: 10 <i>Behind the Testimony of America's #1</i> 11 <i>Domestic Extremist w/ Patrick Byrne</i> 12 (RHB00790-RHB00846)		
13	38. Certified Transcript of Defendant Patrick 14 Byrne's September 8, 2023 interview on 15 <i>The Courtenay Turner Podcast</i> , Episode 16 305: <i>Behind the Testimony of America's</i> 17 <i>#1 Domestic Extremist w/ Patrick Byrne</i>		
18	39. Telegram post by Defendant Patrick Byrne 19 on September 17, 2023, including 20 associated comments (RHB00169)		
21	40. X post by Defendant Patrick Byrne on 22 October 8, 2023 (RHB00147; Pg. 3 of 23 Exhibit B to Plaintiff's Complaint)		
24	41. X post by Defendant Patrick Byrne on 25 October 8, 2023, including associated 26 comments (RHB00146; Pg. 2 of Exhibit B 27 to Plaintiff's Complaint)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
42.	X post by Rep. Eric Swalwell on October 8, 2023, including associated comments (RHB00143-145)		
43.	X post by @AzPinkLady on October 11, 2023, including associated comments (RHB00125-126)		
44.	X post by @AzPinkLady on October 11, 2023, including associated comments (RHB00128)		
45.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00141-142)		
46.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00148)		
47.	X post by Defendant Patrick Byrne on October 23, 2023, including associated comments (RHB00109)		
48.	October 26, 2023 Demand for Retraction Letter to Defendant Patrick Byrne, sent by Plaintiff's counsel of record (RHB00404-406)		
49.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00124, 149)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
50.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00102-103, 112-117, 119)		
51.	Truth Social post by @RickRichGuillot on November 9, 2023, including associated comments (RHB00171)		
52.	X post by Defendant Patrick Byrne on November 10, 2023, including associated comments (RHB00118, 137)		
53.	X post by Defendant Patrick Byrne on November 13, 2023, including associated comments (RHB00108, 132)		
54.	Screenshot of link to Defendant Patrick Byrne's November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled "Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE" (RHB00183)		
55.	Transcript of Defendant Patrick Byrne's November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled "Sued by Hunter Biden Former Overstock CEO Patrick Byrne"		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
3	4 <i>Enters the StoneZONE” (RHB00847- RHB00864)</i>		
5	6 7 8 9 10 56. Certified Transcript of Defendant Patrick Byrne’s November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled “ <i>Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE</i> ”		
11	12 13 57. X post by @AzPinkLady on November 14, 2023, including associated comments (RHB00129-131)		
14	15 16 58. Telegram post by Defendant Patrick Byrne on December 5, 2023, including associated comments (RHB00166)		
17	18 19 20 21 59. Transcript from George Berges’ January 9, 2024 Congressional Transcribed Interview with the House Committee on Oversight and Accountability and House Committee on the Judiciary (RHB00266-403)		
22	23 24 25 26 27 28 60. January 9, 2024 Letter to Rep James Comer, Chairman of the House Committee on Oversight and Accountability, and Rep. Jim Jordan, Chairman of the House Committee on the Judiciary, from William Pittard, counsel for George Berges		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	(RHB00407-410)		
61.	X post by @AzPinkLady on January 11, 2024 (RHB00134)		
62.	X post by @AzPinkLady on January 11, 2024 (RHB00135)		
63.	X post by Senator mark Kelly on January 11, 2024, including associated comments (RHB00136)		
64.	Telegram post by Scott Adams on February 4, 2024, including associated comments (RHB00165)		
65.	Truth Social post by Defendant Patrick Byrne on February 13, 2024, including associated comments (RHB00170)		
66.	Truth Social post by Defendant Patrick Byrne on February 22, 2024, including associated comments (RHB00172)		
67.	Text Thread between Defendant Patrick Byrne and Anil Anwar between March 16, 2024 to April 16, 2024 (Byrne_0000021)		
68.	April 1, 2024 Affidavit of John Moynihan (Byrne_000001-3)		
69.	X post by Defendant Patrick Byrne on April 8, 2024, including associated comments (RHB00717)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
70.	X post by Defendant Patrick Byrne on April 25, 2024 (RHB00107)		
71.	X post by @AzPinkLady on April 25, 2024, including associated comments (RHB00127)		
72.	Telegram post by Defendant Patrick Byrne on June 5, 2024, including associated comments (RHB00704)		
73.	X post by @AzPinkLady on June 30, 2024 (RHB00133)		
74.	X post by Defendant Patrick Byrne on July 22, 2024, including associated comments (RHB00138-140)		
75.	August 9, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Interrogatories, Set One		
76.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's Interrogatories, Set Two		
77.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's Interrogatories, Set Three		
78.	September 9, 2024, emails between Plaintiff's counsel of record and Jared Roberts, attorney for Ret. Lt. Gen. Michael		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	Flynn (RHB00506-508)		
79.	September 17, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set One		
80.	September 19, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Requests for Admissions, Set One		
81.	September 19, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests Admissions, Set Two		
82.	September 19, 2024 Letter to Capitol Times Media LLC from Plaintiff's counsel of record (RHB00445-505)		
83.	Telegram post by Defendant Patrick Byrne on October 7, 2024, including associated comments (RHB00705)		
84.	October 10, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set Three		
85.	October 10, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents,		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	Set Four		
86.	X post by Defendant Patrick Byrne on October 26, 2024, including associated comments (RHB00706)		
87.	October 29, 2024 Screenshot of Defendant Patrick Byrne's X Profile (RHB00707)		
88.	October 29, 2024 Screenshot of website enemywithindocuseries.com (RHB00708)		
89.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>The Deep Rig: How Election Fraud Cost Donald J. Trump the White House, By a Man Who did not Vote for Him: (or what to send friends who ask "Why do you doubt the integrity of Election 2020"</i> , for sale on Amazon.com (RHB00710)		
90.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>Danger Close: Domestic Extremist #1 Comes Clean</i> , for sale on Amazon.com (RHB00709)		
91.	Defendant Patrick Byrne's book, including audio version, <i>Danger Close: Domestic Extremist #1 Comes Clean</i> , published on February 15, 2024 (RHB00509-RHB00694)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
92.	Truth Social post by @TXFreedom4Ever in 2023 (exact date unknown), including associated comments (RHB00173)		
93.	Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)		
94.	Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)		
95.	Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)		
96.	Truth Social post by @cziggy218 in 2023 (exact date unknown), including associated comments (RHB00181)		
97.	Truth Social post by @nancydunks in 2023 (exact date unknown), including associated comments (RHB00182)		
98.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00174)		
99.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	(RHB00176)		
100	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00170)		
101	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00175)		
102	Remittance Advance Invoice from Simon & Schuster UK Ltd., dated September 4, 2021 (RHB00411)		
103	Royalty Statements from Simon & Schuster from March 2020 through September 2024 (RHB00412-443)		
104	Royalty Ledger from Book/Lab Literary Agency (date unknown) (RHB00444)		
105	Hunter Biden <i>Beautiful Things</i> Press Kit (RHB00189-265)		
106	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25”		
107	Certified Transcript of Audio Recording produced by Defendant in Discovery on		



<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25” (RHB01413-1414)		
108	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-08-46-17”		
109	Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-08-46-17” (RHB01415-1416)		
110	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-14-43-38”		
111	Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-14-43-38” (RHB01417-1418)		
112	Defendant’s passport photographs produced by Defendant in discovery on November 4, 2024 (Byrne_0000024-Byrne_0000045)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
113	Defendant's "medical notes" provided by Defendant via email on November 4, 2024		
114	Defendant's American Express recorded from July 2023, produced by Defendant in discovery on January 17, 2025 as (Byrne_0000046-Byrne_0000047)		
115	Defendant Patrick Byrne's responses to Rule 26 Initial Disclosures,		
116	Defendant Patrick Byrne's responses to Special Interrogatories		
117	Certified copy of the Order After Trial, <i>Nazerali v. Mitchell, et al.</i> No. S-116979		
118	Certified copy of Reasons for Judgment, <i>Nazerali v. Mitchell, et al.</i> No. S-116979		
119	IRS Amended 990 Form for The American Project for 2021		
120	IRS 990 Form for The American Project for 2021		
121	IRS 990 Form for The American Project for 2022		
122	US Securities and Exchange Commission Form 4 for Overstock.com, Inc., 9/18/2019		
123	X post by Defendant Patrick Byrne on January 10, re Com Glover and January 6		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
3	crowd		
4 5 6	124 Substack post by Defendant Patrick Byrne on January 10, re Comm. Glover and January 6 crowd		
7 8	125 X post by Defendant Patrick Byrne on January 15 re we are undefeated		
9 10	126 X post by Defendant Patrick Byrne on January 22 re greatest patriots of our time		
11 12	127 X post by Defendant Patrick Byrne on January 25 re January 6		
13 14	128 X post by Defendant Patrick Byrne on January 28 re 2020 election		
15 16	129 X repost by Defendant Patrick Byrne on February 5 re government		
17 18	130 X post by Defendant Patrick Byrne on March 11 re rigging of Election 2020		
19 20	131 X repost of Jake Lang's January Political Prisoner post by Defendant Patrick Byrne		
21 22	132 "The Enemy Within" Docuseries by Patrick Byrne (2024).		
23 24	133 "The Deep Rig" Documentary by Patrick Byrne (2021).		
25 26 27 28	134 <i>US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation v. Patrick Byrne</i>		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	Complaint Civil Action No. 1:21-cv--02131		
135	<i>US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation v. Patrick Byrne</i> Notice of Appeal Civil Action No. 1:21-cv--02131		

Plaintiff reserves the right to request that the Court permit Plaintiff's Trial Exhibit List to be amended to allow for additional exhibits to be included in the list pursuant to Federal Rule of Civil Procedure Section 16(e). Plaintiff also reserves pursuant to the right to pursuant to Federal Rule of Civil Procedure 16-2.3 to use impeachment exhibits that are not included on Plaintiff's Trial Exhibit List during the trial of this case. The parties have not stipulated to the authenticity or admissibility of these trial exhibits as of the filing of this Trial Exhibit List.

Dated: July 9, 2025

EARLY SULLIVAN WRIGHT GIZER & MCRAE LLP

By: /s/ *Zachary C. Hansen*

BRYAN M. SULLIVAN (State Bar No. 209743)
bsullivan@earlysullivan.com
ZACHARY C. HANSEN (State Bar No. 325128)
zhansen@earlysullivan.com
EARLY SULLIVAN WRIGHT GIZER & McRAE LLP
6420 Wilshire Boulevard, 17th Fl.
Los Angeles, California 90048

1 Telephone: (323) 301-4660
2 Facsimile: (323) 301-4676

3 Richard A. Harpootlian, *pro hac vice*
4 *rah@harpootlianlaw.com*
5 Phillip Barber, *pro hac vice*
6 *pdb@harpootlianlaw.com*
7 RICHARD A. HARPOOTLIAN, PA
8 1410 Laurel Street
9 Columbia, South Carolina 29201
10 Telephone: (803) 252-4848
11 Facsimile: (803) 252-4810

12 *Attorneys for Plaintiff*
13 *Robert Hunter Biden*

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